

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

In re:)	
)	
DORIS ANN MOORE)	Case #: 09-43016-DRD-7
)	
Debtor.)	
_____)	

**MOTION TO ENTER INTO A COMPROMISE AND EXECUTE AN ACCEPTANCE OF
COMPENSATION**

COMES NOW, Janice E. Stanton, Trustee in bankruptcy for the above-referenced debtors (the “Trustee”), by and through her Counsel, and hereby notifies all parties in interest that the Trustee proposes to enter into a compromise with Wells Fargo (the “Compromise”) on the terms hereinabove set forth. In support thereof, Counsel for the Trustee states:

1. The Debtor filed the above styled proceeding under the provisions of Chapter 7 of the Bankruptcy Code on Jun 29, 2009. On August 27, 2009, the Trustee filed a Report of No Distribution.

2. The Trustee was advised that the Debtor has an asset of this bankruptcy estate arising from a civil money penalty issued by the Federal Reserve Board against Wells Fargo from which the Debtor is to benefit. (the “Claim”).

3. The Trustee filed a Motion to Reopen this Case to administer this asset and this Court entered an Order on May 7, 2015, reopening this bankruptcy proceeding. The Trustee withdrew her Report of No Distribution on August 6, 2015.

4. The Trustee shall receive from Wells Fargo Financial Consent Order Claims Administrator \$9,196.23 in settlement of the claim. The debtor has passed away since the filing of the Chapter 7. Wells Fargo requires that the Trustee sign an Acceptance of Compensation and

Release, whereby the Trustee will release Wells Fargo Financial, Inc. and Wells Fargo and Company, and their subsidiaries, successors and assigns, from any and all claims relating to Wells Fargo Financial origination of a more expensive mortgage loan than the loan in which the debtor may have qualified.

5. The Trustee asserts that to enter into the compromise and execute the release is in the best interests of this bankruptcy estate as the funds will provide a distribution to creditors.

WHEREFORE, the Trustee respectfully moves this Court to enter an Order which authorizes the Trustee to enter into a compromise and execute an acceptance of compensation and release on the terms hereinabove set forth herein; and for such other and further relief as this Court deems just and proper.

Respectfully submitted;

/s/ Janice E. Stanton

Janice E. Stanton, MO BAR# 34055
STANTON & REDLINGSHAFFER, L.L.C.
104 West 9th Street - Suite 303
Kansas City, Missouri 64105
Telephone: (816) 421-7770
Facsimile: (816) 421-7773
Chapter 7 Trustee

CERTIFICATE OF SERVICE

I hereby certify that I have furnished a copy of the above and foregoing Motion to Enter into a Compromise to the following by United States Mail, postage prepaid, or by electronic transmission on the **7th** day of **August, 2015**:

/s/ Janice E. Stanton

Janice E. Stanton, Trustee